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April 12, 1995

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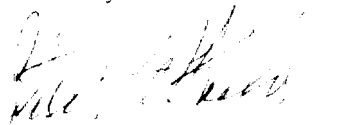
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Before the
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Billed Party Preference for)
0+ InterLATA Calls)

CC Docket No. 92-77

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COMMENTS OF GATEWAY TECHNOLOGIES, INC. ON
COMPTEL'S PROPOSAL FOR AN OPERATOR SERVICES RATE CEILING

Gateway Technologies, Inc. ("Gateway"), by its attorneys, hereby responds to the Commission's requests for comment¹ on the proposal for enactment of a "rate ceiling" for operator service calls submitted by the Competitive Telecommunications Association ("CompTel") and an allied coalition of local exchange carriers, competitive access providers and private payphone operators.²

INTRODUCTION AND SUMMARY

CompTel and its affiliated parties propose that the Commission adopt a rate ceiling, or rate cap, for operator service providers ("OSPs") as an alternative to billed party preference ("BPP"). This rate ceiling is designed to protect those consumers who are choosing not to "dial around" the presubscribed OSP serving aggregator locations and are being charged "excessive rates" by that carrier.³ By instituting a ceiling on OSP rates, the proposal seeks to ensure that OSPs charge just and reasonable rates without entailing the costs and implementation delays associated with BPP.

Whether or not CompTel's rate cap offers the workable and effective tool its proponents envision,⁴ the Commission should recognize that the proposal applies exclu-

¹ Public Notice, DA 95-473 (released March 13, 1995).

² Ex Parte Proposal by CompTel, Bell Atlantic, NYNEX, BellSouth, MFS Communications, US West, Teleport Communications Group and American Public Communications Council, CC Docket No. 92-77 (March 8, 1995) ("CompTel Rate Cap Proposal").

³ *Id.* at 2.

⁴ *Id.* at 5-7.

sively to OSPs, and not to inmate service providers. There are two overriding reasons for this important distinction. First, the policy concerns driving CompTel's proposal simply do not apply—as the Commission has held in the past—to the unique inmate services market. Second, the proposal's express terms and conditions, as well as its cost justifications, focus exclusively on "OSPs" and "aggregators," categories which do not encompass inmate service providers. Wrapping inmate services into the CompTel OSP rate ceiling is therefore inappropriate.

The issue of a rate cap for inmate services has been the subject of comment in connection with the 1994 Further Notice in this docket,⁵ and was also addressed in a separate February 21, 1995 ex parte proposal by the American Public Communications Council's Inmate Calling Service Providers' Task Force ("APCC/ICSPTF") for an inmate services rate cap.⁶ Gateway believes that the Commission should, in the first instance, use its investigative and enforcement powers to target specific inmate service providers whose rates are excessive, adopting a rate cap only as a last resort. If the Commission is nonetheless inclined to consider a rate cap for inmate services, it should solicit comment on the APCC/ICSPTF proposal and alternative rate ceiling proposals. Gateway fundamentally disagrees with the APCC/ICSPTF proposal, which would permit inmate providers to substantially exceed dominant carrier rates and thus establish a virtual "price umbrella" in the inmate services market. In these comments, Gateway outlines a superior—and far lower—inmate services rate cap, one that would better serve the interests of both competition and inmate service consumers.

⁵ Billed Party Preference for 0+ InterLATA Calls, Further Notice of Proposed Rulemaking, CC Docket No. 92-77, 9 FCC Rcd. 3320, ¶¶ 42-46, 51 (released June 6, 1994)("Further Notice").

⁶ Comments of APCC/ICSPTF on Notice of Inquiry, CC Docket No 94-158 (filed March 9, 1995).

DISCUSSION

I. INMATE SERVICES ARE A UNIQUE MARKET THAT DOES NOT PRESENT THE POLICY CONCERNS UNDERLYING COMPTTEL'S RATE CAP PROPOSAL

As the leading proponent of the Commission's 1991 decision exempting inmate service providers from the unblocking requirements of Section 226 of the Communications Act,⁷ Gateway has demonstrated that the inmate service provider industry—and the correctional facilities it serves—has unique fraud, security and cost requirements that clearly distinguish it from the OSP market. The policy objectives driving CompTel's rate cap proposal highlight some of these important distinctions.

The CompTel coalition maintains that “the only lingering concern” in the OSP market is the consumer who chooses not to dial around the presubscribed carrier serving aggregator locations and is later surprised to be billed at an excessive rate.⁸ The proposal seeks to arrest this concern by imposing rate ceilings for the benefit of those consumers who fail to exercise their option to select the carrier of their choice.

In a statistically small number of cases, callers who choose not to dial around the presubscribed OSP are charged excessive rates. The simple FCC enactment of a rate ceiling above which OSPs may not charge without submitting comprehensive cost justifications would ensure the consumers pay only just and reasonable charges.⁹

While CompTel's proposal was designed to protect OSP consumers who do not or cannot “dial around” presubscribed carriers, this concern is simply not an issue in the inmate service provider industry.

The inmate services industry is driven by the substantial security and fraud prevention needs inherent in providing telecommunications services to correctional institutions. These policy imperatives require inmate carriers to block inmate access to OSPs

⁷ Policies and Rules Concerning Operator Service Providers, Report and Order, 6 FCC Rcd. 2744, ¶ 15 and nn.17, 30 (1991)(“TOSCA Order”), citing Comments of Gateway Technologies, Inc. on Further Notice of Proposed Rulemaking, CC Docket No. 90-313, at 3-4 (filed Jan. 22, 1991).

⁸ CompTel Rate Cap Proposal at 2, 5.

⁹ Id. at 2.

and restrict inmate calls to a collect-only basis.¹⁰ The consumer, in the inmate services industry, is thus the called party, not the dialing party. But there is no dispute, as the previous comments on inmate services in this proceeding establish, that the severe security and fraud prevention requirements of correctional institutions demand that all inmate calls be routed to a designated inmate services provider. Indeed, it was these same “exceptional circumstances” that served as the basis for the Commission’s 1991 decision exempting correctional institutions from the 950, 800 and 10XXX unblocking requirements imposed on aggregators—exempting inmates from the “dial around” protections accorded consumers using hotel telephones and both public and private pay-phones.¹¹

In short, the unique circumstances of the inmate services market require inmate carriers to block inmate-only telephones, a result sanctioned by the Commission and not challenged by any of the inmate advocates appearing in this proceeding. Thus, because dial around is not an option for inmate calls, the rationale for CompTel’s rate ceiling proposal is inapplicable to the inmate services industry. Whether an inmate services rate cap is for other reasons a sensible response to any rate-related excesses that may exist in inmate services, the CompTel coalition’s OSP proposal should not be extended to inmate services providers.

II. THE PROPOSED RATE CAP’S TERMS AND CONDITIONS APPLY EXCLUSIVELY TO OSPs AND AGGREGATORS

An analysis of the language and substance of CompTel’s proposal clearly demonstrates that it only applies to OSPs and aggregators and thus, by definition, does not include inmate service providers.

CompTel’s proposal never specifically, or even indirectly, refers to correctional institutions or inmate service providers. Given the Commission’s particular focus and

¹⁰ See, e.g., Gateway 1994 BPP Comments (August 1, 1994), Gateway 1994 BPP Reply Comments (filed September 14, 1994) and Gateway 1995 BPP Ex Parte Letter (February 1, 1995).

¹¹ TOCSIA Order, 6 FCC Rcd. at 2752.

attention on the inmate services market in its Further Notice,¹² the proposal's silence speaks loudly that it was not meant to apply to inmate service providers. To the contrary, the proposed benchmark explicitly incorporates pricing factors applicable to OSPs serving hotels, hospitals, airports and other typical aggregator locations. Under the CompTel proposal, charges would be capped at a flat per-minute rate incorporating all surcharges and premise-imposed fees "without regard to time-of-day, distance, automated or live, calling card or collect or any of the other complicating factors" that would burden regulatory enforcement.¹³ This type of rate structure, which treats both direct-dialed (calling card, etc.) and operator-assisted calls interchangeably, is clearly designed to regulate the broader OSP market serving aggregator locations, while offering a streamlined, easily administered benchmark not tied to any one specific type of OSP service.

Inmate service providers, however, do not offer the same broad mix of operator services available from OSPs serving aggregator locations, making CompTel's "averaged" rate ceiling economically inappropriate for the collect-only services available at correctional facilities. Moreover, the cost assumptions underlying CompTel's proposed rate structure are dramatically different from the costs associated with inmate services. The CompTel proposal suggests that the Commission rely on a strictly limited set of cost categories in judging the reasonableness of OSP rates that exceed the rate ceiling: "(1) access costs, (2) billing and collection costs, (3) network costs, (4) operator and call processing costs, (5) general and administrative costs, (6) cost of capital, and (7) commissions, surcharges and similar fees."¹⁴ While these categories represent the principal components of most OSPs' cost structures, they fail to reflect the quite different costs of providing inmate services. These include, most significantly, the substantial costs associated with supplying and maintaining specialized correctional institution

¹² Further Notice, ¶¶ 42-46, 51.

¹³ CompTel Rate Cap Proposal at 7-8.

¹⁴ Id. at 6.

CPE, operational expenses for configuring call blocking functions and inmate PINs, and the increasing demands by correctional facilities for specialized telecommunications reporting and management services.

These special inmate service costs are not included in CompTel's cost categories, nor were they considered in calculating the averaged per-minute ceilings in CompTel's rate cap. As Gateway has shown before, any rate cap proposal on inmate service providers must consider and include these essential costs, at the "price" of destroying the economic basis under which most correctional institution CPE is provided free by the inmate carrier, without charge to correctional institutions or taxpayers.¹⁵ Thus, the structure of CompTel's proposal clearly demonstrates that it was specifically designed for the OSP market, and fails to reflect the unique characteristics of the inmate services market.

As further evidence that CompTel's proposal does not apply to inmate service providers, the APCC—a signatory to the CompTel coalition ex parte—has through its Inmate Calling Services Providers Task Force formally proposed a completely separate benchmark form of rate regulation specifically for inmate service providers.¹⁶ Although both are supported by the APCC, these two rate cap proposals are diametrically opposed. CompTel's rate plan emphasizes that the rate ceiling should not be based on the dominant carrier's rates.¹⁷ As explained in greater detail below, the APCC/ICSPTF proposal is based on the dominant carrier's rates. The existence of these two sharply inconsistent rate cap proposals plainly confirms that the CompTel proposal was not designed for and should not be applied to the inmate services market.

Indeed, the CompTel rate cap expressly applies to OSPs and aggregators. As the CompTel ex parte submission states, "[a] fair rate ceiling should strike a proper balance

¹⁵ Gateway 1995 Ex Parte Letter at 6-7.

¹⁶ ICSPTF Ex Parte Letter, CC Docket Nos. 92-77 & 94-158, at 2 (February 21, 1995) ("APCC/ICSPTF Ex Parte").

¹⁷ CompTel Rate Cap Proposal at 7-8

between the interests of consumers in obtaining reasonable rates and aggregators' rights to recover their costs of making equipment available for public use."¹⁸ Of course, it is settled that "OSP" and "aggregator" are statutory terms of art which the Commission has specifically defined to exclude inmate service providers and correctional institutions.¹⁹ In addition, the CompTel proposal is designed to allow aggregators to recover their costs associated with supplying equipment to the "general public."²⁰ Inmates are not the "general public," and the equipment costs associated with correctional institution CPE vastly exceed the typical costs even of store-and-forward payphones or hotel PBX systems.

Thus, given the proposal's specific terms, the details of its cost structure, and the presence of APCC/ICSPTF's inconsistent proposal for an inmate services rate cap, it is clear that CompTel's proposal does not and should not apply to inmate service providers.

III. ANY INMATE SERVICES RATE CAP SHOULD PROPERLY REFLECT PREVAILING MARKET RATES INSTEAD OF CREATING AN ARTIFICIAL "PRICE UMBRELLA" SHIELDING INMATE PROVIDERS FROM RATE COMPETITION

As Gateway has shown in this and related Commission proceedings, the inmate services industry is characterized by robust competition, including rate, service, equipment and commission rivalry.²¹ Moreover, in the majority of instances, correctional institution requests for proposals, and subsequent contracts, routinely include rate-related safeguards, typically keyed to the collect rates charged by the LEC or another dominant carrier.²² While there appear to be a handful of egregious examples of inmate

¹⁸ *Id.* (emphasis supplied).

¹⁹ "We conclude that the definition of 'aggregator' does not apply to correctional institutions in situations in which they provide inmate-only phones." Policies and Rules Concerning Operator Service Providers, Report and Order, 6 FCC Rcd. 2744, ¶ 15 and nn.17, 30 (1991). Furthermore, the Commission found that "the carrier providing service to inmate-only phones at correctional institutions would not fall under the definition of 'provider of operator services.'" *Id.* at n.30.

²⁰ CompTel Rate Cap Proposal at 7.

²¹ *E.g.*, Gateway Reply Comments, CC Docket No. 94-158, March 24, 1995, at 5-7.

²² Gateway 1994 BPP Reply Comments at 20.

providers whose rates exceed reasonable levels, the Commission has ample rate enforcement authority under Sections 201(b), 203(a) and 205(a) of the Act that can support targeted enforcement actions directed against specific carriers. Thus, given the competitiveness of the market and the Commission's enforcement options, Gateway believes that general rate regulation of the inmate services industry is neither appropriate nor warranted at this time ²³

At the same time, Gateway recognizes that Commission enforcement proceedings may be cumbersome and unwieldy, and that inmate families may lack the resources and expertise to bring instances of unreasonable charges—with supporting documentation—to the Commission's attention. These considerations obviously suggest that the more blunt instrument of a rate ceiling may be preferable for purely pragmatic reasons, at least in the absence of a "test case" enforcement complaint initiated against specific inmate service providers. It is imperative, however, that if the Commission adopts this approach and decides to fashion an inmate services rate ceiling, it do so on the basis of proper cost justification and select a cap that offers positive incentives for controlling extraordinary instances of rate gouging by some unscrupulous inmate service providers. Therefore, if the Commission ultimately considers rate regulation of inmate services, it should at the very least release another Public Notice in this docket allowing interested parties the opportunity to comment on or offer alternatives to whatever rate ceiling is proposed for this market. In a related proceeding recently initiated by the Common Carrier Bureau's Enforcement Division, Gateway has emphasized that if the Commission decides to fashion a rate cap or benchmark, it should adopt a competitive, market-driven ceiling.²⁴

²³ See Gateway 1994 BPP Comments, at 22-23. Gateway also pointed out that the Commission may well lack the statutory authority, consistent with the specific provisions of Section 226 governing rate regulation of the OSP market, to impose a mandatory rate cap on inmate services. *Id.* at 21-22.

²⁴ Gateway Reply Comments, CC Docket No. 94-158, March 24, 1995, at 10-13.

Gateway categorically rejects the APCC/ICSPTF rate cap proposal. While the APCC/ICSPTF scheme uses a “benchmark” based on AT&T’s current operator services surcharge for inmate calling and AT&T’s current daytime usage rates, it also includes a so-called “safe harbor” provision allowing inmate carriers to set their rates substantially above the dominant carrier’s rates.²⁵ Specifically, inmate carriers could charge \$0.50 above the dominant carrier’s rates for the first minute and \$0.15 above the dominant carrier’s rates for the next ten minutes—for a total increment of \$2.00 in excess of dominant carrier inmate service rates, which in turn already exceed ordinary operator-assisted and collect rates. Particularly because most correctional facilities currently key contractual rate guarantees to dominant carrier daytime collect rates, the APCC/ICSPTF “safe harbor” provision effectively creates a “price umbrella” for inmate services, sheltering less efficient or less reputable providers from the rigors of price competition in the RFP process.

In short, the APCC/ICSPTF proposal is less of a rate cap than a rate “fix,” designed not to reduce inmate service rates but to permit a mechanism for tacit rate collusion and rate increases.²⁶ Gateway strongly opposes any inmate services rate cap that would allow inmate carriers to increase their rates or protects inmate carriers from the competitive demands for service and equipment efficiency. In fact, Gateway’s own rates have always been competitive with, and in many cases below, dominant carrier inmate service rates, despite the increased costs arising from the lower volumes and traffic economies associated with resale service. While there is clear justification in inmate services for a surcharge greater than calling card or ordinary collect calls—in order to reflect the unique costs associated with correctional institution CPE and the fraud and security requirements for inmate traffic—Gateway cannot support an inmate

²⁵ ICSPTF Ex Parte Letter at 2.

²⁶ See Gateway Reply Comments, CC Docket No. 94-158, March 24, 1995, at 10-13.

services rate cap that includes per-minute rates in excess of dominant carrier daytime MTS rates.

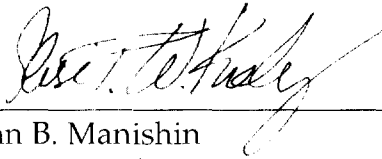
Gateway is currently finalizing a rate cap proposal to present to the Commission, which it believes will be far more acceptable both to regulators and inmate advocates. Gateway's rate proposal will include a rate structure that is bound by existing market rates, consistent with the typical RFP rate constraints currently applied to inmate services, and considerably lower than the APCC/ICSPTF benchmark. Moreover, Gateway is convinced that—given the purely pragmatic rationale for an inmate services rate ceiling—the “back end” provisions in the APCC/ICSPTF proposal allowing carrier-specific cost justifications would prove an administrative nightmare, completely undermining the regulatory streamlining function of a rate ceiling. Gateway accordingly urges the Commission to withhold judgment on inmate services rate regulation until it has allowed an opportunity for public comment on and the submission of alternative proposals for an inmate services rate ceiling.

CONCLUSION

CompTel's rate ceiling proposal clearly does not and should not apply to the inmate services industry. Given the distinctive cost characteristics, “exceptional circumstances” and completely different policy concerns of the inmate services market, an OSP rate cap cannot do double duty as an inmate services rate cap. If it is inclined to consider a rate ceiling for inmate services, the Commission should solicit public comment on rate cap alternatives, taking care to avoid creating a “price umbrella” for sheltering less efficient or unscrupulous inmate service providers from the rigors of marketplace rate competition. Gateway has outlined a superior rate ceiling in these

comments, and will submit a formal inmate services rate cap proposal to the Commission shortly.

Respectfully submitted,

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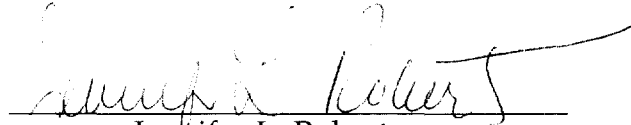
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